## Remarks

## 35 U.S.C. §112.

Applicants have carefully considered the Examiner's rejections under 35 U.S.C. §112 and believe that the claimed invention is described in the specification in sufficient detail to enable one of ordinary skill in the art to put the invention into effect.

The claims have been amended to remove the term "association", but the term "binding" is employed in the claims for reasons that will become apparent from the following.

In order to not only comprehend the basis for the significant changes made to the claims but to understand why the specification comprises a sufficiently full and complete enough disclosure of the invention for putting it into effect, reference will be made to sections of the specification by way of illustration. These sections comprise excerpts which serve to illustrate the context of the invention and the scope of knowledge that would be known to one skilled in the art as well as the directions to the skilled person provided by the invention. As such, these excerpts do not represent the entirety of the disclosure but should be considered as a whole with at least that part of the specification spanning pages 9 to 20.

Page 9, lines 3 to 6: "As known in the art, SIP is a protocol that can be used to set up communication sessions over a packet data network where those communication sessions are for voice, video, instant messaging (IM) or other suitable media".

Page 10, lines 3 and 4: "SIP data network also comprises a SIP proxy or redirect server 15 and a SIP registration 16 and location 17 server as known in the art".

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Page 10, lines 13 to 15: "As mentioned above SIP is defined in IETF RFC 3261 and other RFCs and comprises various different types of entity including SIP endpoints, SIP registrars, SIP location servers and SIP proxy or redirect servers".

Page 10, lines 27 to 30: "SIP endpoints REGISTER their location as per RFC3261 with a SIP Registrar 16 and have an identified Proxy 15 or redirect server through which SIP sessions are passed for Address Resolution and other such functions".

In this connection, a SIP location comprises an IP address and, as such, would be understood by one skilled in the art to be a "network location address" for that entity.

Page 11, lines 7 to 9: "The SIP Registrar 16 is an entity to which the SIP endpoints send REGISTER messages to identify their current location in the data network 14. Generally the SIP Registrar 16 stores data in the location server (or is one and the same as the location server 17 as illustrated in Figure 1)".

Page 11, lines 15 to 24: "As explained in RFC3261 a register request can be used to add, remove and query bindings. In the present embodiment, these bindings are used to form an association between selected agents and addresses of the contact center server 10. A register request can be used to add a binding between one or more contact addresses and an address of record. A "SIP address of record" (AOR), as defined in RFC3261, is a SIP or SIP Universal Resource Indicator (URI) that points to a domain with a location service that can map the URI to another URI where the user might be available. Typically, the location service is populated through registrations. An AOR is frequently thought of as the "public address" of the user".

A "binding" is a term of art. One skilled in the art knows that a binding is an association between an address (address of record) used in a call message to contact another party (terminal) and a network location address at which the called

party might be available. There may be many bindings between an address of record and a number of possible locations for a called entity. A registrar (registration server) stores (often in a location server) data defining the binding whereby the registration server and location server act, in response to a call request using a called entity's address of record to map that address of record to a network location address at which the entity might be available. In this way, the address of record is a "public address" for a called entity from the perspective of calling entities which do not then need to know the actual network location (IP) address of said called entity.

Page 11, lines 25 to 27: "This registration process can be performed by a suitably authorised third party on behalf of a particular address of record. In the embodiment being described, the suitably authorised third party is the contact center server 10".

Page 11, line 31 to page 12, line 5: "The location server 17 stores information that assists in resolving a User's Address of Record URI to an actual location that a User is currently Registered at. A SIP proxy or redirect server is able to input a URI to the location server and obtain details of any associated URIs to which to send a request. The information accessible to the location server is either obtained as a result of registrations made at the Registration Server or may be mapping functions configured at the direction of an administrator".

In understanding the context of the invention and the scope of the skilled person's knowledge in the field of the invention, it is important to compare the claimed invention with the high level discussion of a prior art establishment of a communication session in a SIP contact center provided at page 12, line 11 to page 13, line 22 which is not included here for sake of brevity.

Page 13, lines 22 to 30: "The present invention enables contacts to be directed to or from the contact center agents 12 without the need for the contact center server 10. As well as this there is a need to provide a fall-back provision for at least part of the

primary role of the contact center. The primary role of the contact center is considered to be resolution of the requirements of incoming contacts to particular skillsets and locating idle agents within those skillsets to which the contacts can be directed. This is achieved by recording a plurality of associations between contact center agent addresses and addresses of the contact center server 10 and prioritising those associations".

Page 13, lines 31 to 34: "With reference to Figure 2, a plurality of associations between contact center agent addresses and addresses of the contact center server 10 are recorded (see box 20) at a registrar in a communications network (for example, item 16 in Figure 1). Those associations are prioritised (see box 21 of Figure 2)".

Page 14, lines 10 to 15: "The contact center server registers its own address (such as its unique internet protocol (IP) address) against one or more SIP addresses of record such as sales@cc.nortelnetworks.com. End users or customers wishing to contact the contact center use any of these SIP addresses of record and the association information is used to forward the contact to the actual contact center server 10 (see box 22 of Figure 2)".

Thus, it can be seen that the contact center, just like all network entities, has a network location (IP) address. It also has one or more addresses of record. Thus, at least one binding can be established for the contact center between its network location address and its one or more addresses of record.

Page 14, lines 16 to 20: "This association between the contact center server's own address and SIP address(es) of record are given highest priority. Other associations are also registered at the registrar between the SIP addresses of record of the contact center and IP addresses of the contact center agents. Those associations are prioritised".

Thus, the present invention in contrast to the prior art contact center not only registers its binding(s) of its network location address with its address(es) of record but also registers bindings for the network location addresses of its agent terminals with its address(es) of record. This means that, in event of failure of the contact center, a call request to the contact center can be resolved to one of its agent terminals using one of the 'additionally' registered bindings without requiring the contact center to be operational.

It will be appreciated that the term association can be read for binding and this much would be unambiguously clear to one skilled in the art.

Page 14, lines 21 to 23: "If a proxy or redirect server uses a highest priority association to forward a contact to or from the contact center server 10 and that operation fails, the next highest priority association is used (see box 23 of Figure 2)".

Page 14, line 24 to page 15, line 5: "In one embodiment the contact center server 10 registers one or more addresses for itself which it uses to partition incoming contacts into high level applications or skillsets (for example, sales@cc.nortelnetworks.com; support@cc.nortelnetworks.com). End users or customers are aware of these addresses and are able to direct their contacts to those as appropriate. For example, a customer with a sales query uses the sales@cc.nortelnetworks.com address. Contact center agent addresses are associated with these addresses and prioritised as described above. In that way, even when the contact center server 10 is out of action, a customer is able to direct a contact to a contact center address and be forwarded to a particular agent using the prioritised associations. The priority is advantageously arranged such that the most skilled agent for a skillset will be offered the contact first, followed by the next most skilled agent and so on. The priority system can be configured in other ways as required by the contact center provider".

Page 15, lines 24 to 28: "SIP also allows that once a SIP endpoint has established bindings at a registrar, it may send subsequent registrations containing new bindings or modifications to existing bindings. This enables the contact center server 10 to make multiple registrations for a given contact center agent endpoint. These multiple registrations enable the priority of associations to be set up".

The description from page 15, line 29 through to page 20, line 5 adds further clarification and support to the foregoing.

Accordingly, applicants believe that the claims as amended clearly define the invention in a manner sufficiently complete and clearly enough to enable the invention to be put into effect by one skilled in the art using his ordinary knowledge in the field and the directions provided by the specification.

It is respectfully submitted that the claims as amended meet the requirements of 35 U.S.C. §112 having regard to the content of the specification as filed and the ordinary knowledge of the person skilled in the art.

Favorable reconsideration of the U.S.C. §112 rejection of claims 1 to 19 is requested. New claim 20 is added to define a previously unclaimed aspect of the invention and is believed to be fully supported by the specification.

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Respectfully submitted,

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